

## Buckner, Edwin

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**From:** Wood, Heather <Heather.Wood@tetrattech.com>  
**Sent:** Tuesday, June 16, 2015 3:18 PM  
**To:** Witkovski, Gary; Buckner, Edwin  
**Subject:** Recycletronics

Gary and Ed,

After I got off the phone with you two, I went back to the facility to do the exit interview. The owner, Aaron Rochester, had gotten on the phone with his recycler. It turns out that the CRTs are being collected for recycling by Technologies Displays Americas (TDA) of Calexico, California. TDA is then exporting the leaded glass to Technologies Displays Mexicana SA de CV (TDM). These are apparently both subsidiaries of the same company (<http://www.caliresources.com/US/CrossBorder.htm>), but separately operated. Rochester provided the shipping documents provided by TDA and the Acknowledgement of Consent to export that TDM provided to TDA. So, it appears to me that Recycletronics is not exporting—TDA is.

As a result, I inspected the facility for the exclusion requirements for CRT processors that are not exporting (261.39(b)). The materials are being processed and accumulated in a building and they are going to a lead smelter. I am still waiting for some documents from him to demonstrate that the materials are not speculatively accumulated. He told me that the computer that has all the records for (a) materials received and (b) shipments to another recycler (Closed Loop) is in the shop. It looks to me like Closed Loop is the company in Ohio that called IDNR with the original complaint (<http://closedlooprr.com/certifications/>). After I review this, if we can't confirm that 75% of the input went out for recycling, I will add the 262.11 finding back on.

Let me know if you have any questions.

**Heather K. Wood, RG, LEED AP**  
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